

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(PROPOSAL TWO)

Docket No. RM2020-7

MOTION OF THE UNITED STATES POSTAL SERVICE FOR  
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL TWO  
(May 29, 2020)

Order No. 5478 (April 9, 2020) established the procedural schedule in this proceeding and, while setting a date for initial comments, made no provision for reply comments. Initial comments were filed on May 22, 2020 by the Public Representative. The Public Representative appears to support some elements of Proposal Two, but offers several criticisms and also suggests alternative analytic procedures. The Postal Service believes that the analysis of the Public Representative contains computational errors and misstatements of the Postal Service's position, and therefore requests leave to file reply comments addressing the issues that he raises. Acceptance of those reply comments would enhance the Commission's ability to evaluate the criticisms of Proposal Two advanced in the PR Comments, and thus create a more complete record for consideration of the Proposal. The Postal Service would otherwise have no opportunity to respond to the new material presented within those comments, or to correct the mistakes therein. The Postal Service reply comments are proffered in a separate pleading submitted concurrently.

Wherefore, the Postal Service respectfully requests leave to file reply comments responding to the initial comments filed in the proceeding by the Public Representative.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 29, 2020